

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ERIC DAVID VIDAL CRUZ

DEBTOR

CASE NO 20-04750 EAG

CHAPTER 13

**DEBTOR'S OPPOSITION TO TRUSTEE'S MOTION REQUESTING ENTRY OF
ORDER TO INFORM DOCKET NO. 31**

TO THE HONORABLE COURT:

COMES NOW, ERIC DAVID VIDAL CRUZ, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 15, 2022, the Chapter 13 Trustee filed a *Trustee's Motion Requesting Entry of Order to Inform*, Docket No. 31, stating that as per Schedule I of the Bankruptcy Petition the Debtor is employed by *Cuerpo de Bomberos de PR*, that "... since a series of government employees will be receiving a special bonus between \$2,954.00 and \$11,360.00..." and this "... bonus constitutes property of the estate and disposable income..." the Trustee requests the Court to enter an Order for the Debtor to inform whether the Debtor received said bonus, the amount received and when the Debtor would be submitting the same to fund the Plan. *Trustee's Motion Requesting Entry of Order to Inform*, at paragraphs 2 and 6, Docket No. 31.

2. The Debtor respectfully opposes the Trustee's request for entry of Order (Docket No. 31) on the grounds that on December 13, 2022, the Debtor did inform to the Chapter 13 Trustee that on December 01, 2022 the Debtor received the sum of \$2,521.24 as a "special bonus" and that the Debtor is requesting authorization for the use of these funds to cover "reasonable and necessary" household/family expenses. *See: Debtor's Motion Requesting Order Re: Authorization to Use Funds From Government Special Bonus*, Docket No. 30.

3. As of the present date, December 15, 2022, the Chapter 13 Trustee nor any other party has objected to the Debtor's request for authorization for the use of the funds from the "special bonus", Docket No. 30.

WHEREFORE, the Debtor respectfully requests from this Honorable Court to grant the present motion and deny the *Trustee's Motion Requesting Entry of Order to Inform*, Docket No. 31, in the above captioned case.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee and to all Cm/ECF system participants; and I also certify that I have mailed by United States Postal Service copy of this motion to the Debtor, Eric David Vidal Cruz, Guavate Ward 21403 Sector Inocencia Cruz Cayey PR 00736, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 15th day of December, 2022.

/s/Roberto Figueroa Carrasquillo

USDC #203614

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